DECLARATION OF XIANZHI LIU ISO GOOGLE LLC'S RESPONSE TO THE COURT'S 10/27/22 ORDER TO SHOW CAUSE (DKT. 784)

Redacted Version of Document Sought to be Sealed

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

CHASOM BROWN, et al., individually and on behalf of all similarly situated,

      Plaintiffs,

      vs.

GOOGLE LLC,

      Defendant.

Case No. 4:20-cv-03664-YGR-SVK

DECLARATION OF XIANZHI LIU

1.   I am a Google Software engineer and have worked on Ads Counterfactuals for Google's Search Ads Experiment Infrastructure team for more than 4 years. In this role, I regularly work with ███████ logs in the course of my day-to-day job responsibilities. I make this declaration of my own personal, firsthand knowledge, and if called as a witness, I could and would testify competently thereto.

2.   I understand that Google served a declaration of Martin Šrámek in the above-captioned litigation on June 14, 2022, which identified, among other logs, the following ███████ logs that contain the "maybe_chrome_incognito" bit:

- ███████████
- ████████████

3.   These ██ ████████ logs are used for analysis and modeling. To perform this analysis and modeling, the logs ████████████████████████████████████ ████████████████████████████████████ ████████████████████████████████████ ████████████████████████████████████ ████████████████

4.   These ████████ logs do not record any further action from the user (*e.g.*, views,

1   interactions, or clicks) that is not already recorded in the corresponding ▮▮▮▮▮▮ or

2   ▮▮▮▮▮▮▮▮ logs. Thus, the only event-level browsing data in these

3   ▮▮▮▮ logs (including the "maybe_chrome_incognito" field) is duplicated directly from the

4   ▮▮▮▮▮▮▮▮▮▮ logs. All of the additional data stored in

5   these ▮ logs is ▮▮▮▮▮▮

6   ▮▮▮▮▮▮▮▮▮▮▮▮▮

7   ▮▮▮▮▮▮▮▮▮▮▮▮▮

8   ▮▮▮▮▮▮▮▮.

9   5.   Attached hereto as Exhibit A is a ▮▮▮▮▮▮▮ User Guide" that

10 I assisted with preparing in the course of my day-to-day employment responsibilities at Google.

11 Both of the logs identified in paragraph 2 are ▮▮▮▮▮▮ logs, which is denoted by

12 the ▮▮ prefix in the log names.

13   6.   Exhibit A is a user guide that (i) identifies a code snippet that explains how

14 ▮▮▮▮ experiments are configured, *see* Ex. A at 2-4; and (ii) summarizes the use case for

15 ▮▮▮▮▮ :

16 ▮▮▮▮▮▮▮▮▮▮▮▮▮

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20 Ex. A at 1.

21   7.   Before being contacted by counsel for purposes of this declaration, I was not aware

22 of the "maybe_chrome_incognito" bit or any other bit that purports to estimate Chrome Incognito

23 status. The maybe_chrome_incognito bit is recorded in the ▮▮▮▮▮ logs identified in

24 paragraph 2 above only because the ▮▮▮▮ logs take wholesale the fields from the ▮▮▮▮

25 ▮▮▮▮ or ▮▮▮▮▮▮ logs.   As   such,   when   the

26 maybe_chrome_incognito bit was added to the ▮▮▮▮▮ or ▮▮▮▮

27 ▮▮▮▮ logs previously identified by Google, it was copied to each of the ▮▮▮▮ logs

28 identified in paragraph 2 above.

8.   The [REDACTED] logs identified in paragraph 2 above have not been used to perform analysis specifically directed at Incognito browsing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 29 day of November 2022 at Mountain View, California.

By: _____

DocuSigned by:

Xianzhi Liu

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Xianzhi Liu

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Case No. 4:20-cv-5146-YGR-SVK

DECLARATION OF XIANZHI LIU